

Summary of Annette Liebe's Testimony

On behalf of STAPPA/ALAPCO

Transportation remains a dominant source of air pollution across the nation, contributing substantial amounts of smog-forming emissions, particulate matter, carbon monoxide, greenhouse gases and toxic air pollutants, as well as to the formation of regional haze. Although we continue to make great progress in reducing emissions from mobile sources, it is clear that the benefits from technological advances can not keep pace with current and foreseeable trends of steadily increasing vehicle miles traveled.

Transportation conformity and CMAQ programs are critically important to the goal of achieving full integration of environmental and transportation decision-making processes and to ensuring that transportation choices do not undermine efforts to achieve and sustain clean, healthful air throughout the country.

With respect to transportation conformity, our associations strongly believe that the purpose of the program – which is to ensure that transportation plans and programs stay within the allotted mobile vehicle emissions budget – is absolutely crucial to achieving clean air goals. Unless this purpose is achieved, it will be necessary to call upon other source sectors, potentially including small businesses, to further reduce emissions.

We believe conformity is working well and strongly endorse preserving the major conformity requirements and schedules that are now in place. Accordingly, we are troubled that proposed changes to transportation conformity in recent Senate and House legislation, including H.R. 3, could seriously weaken the program and undermine the ability of states and localities to attain and maintain national ambient air quality standards. We believe, however, the most problematic provisions are included in the Senate bill, and urge the House to reject them.

We strongly support the CMAQ program and believe it can be strengthened in several ways.

First, since CMAQ was originally established, the scope and magnitude of transportation-related emissions and their impact on air quality have expanded significantly. EPA has adopted new, health-based standards for fine particulate matter and ozone, and we are beginning to develop State Implementation Plans to demonstrate attainment and maintenance of these standards. Accordingly, we urge that the areas eligible to receive CMAQ funding be expanded to also include all areas that face air quality challenges as a result of transportation-related emissions.

We strongly urge a substantially increased federal commitment of resources to the CMAQ program, to reflect the true and very significant impact of transportation-related emissions on air quality. This increase should be no less, proportionately, than that to be provided for highway investments. Finally, we recommend that the concurrence of state and local air quality agencies be required for CMAQ project selection, through a well-defined consultation and concurrence process. In Oregon, this concurrence has occurred through the ongoing interagency consultation process that we established under the conformity rule.